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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10	Abilio Hernandez, 11 v. 12 Plaintiff, 13 Allied Collection Services, Inc., 14 Defendant.	Case No.: 2:19-cv-00291-JCM-VCF 15 Stipulation for extensions of time to 16 respond to motions [ECF Nos. 18, 20] (First Request)
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17 Abilio Hernandez (“Plaintiff”) and Allied Collection Services, Inc.
18 (“Defendant”), by and through their respective counsel, hereby submit this
19 stipulation for extensions of time for the parties to respond to Plaintiff’s motion for
20 summary judgment, ECF No. 18, and Defendant’s motion for an order withdrawing
21 admissions under FRCP 36(b), ECF No. 20. Plaintiff’s response is currently due on
22 June 27, 2019. ECF No. 20. Defendant’s response is currently due on July 3, 2019.
23 ECF No. 18.

24 The parties are actively engaged in discussions that may potentially resolve
25 or limit the scope of these pending motions. The parties therefore jointly request an
26 extension of time to respond to the pending motions. The Parties in good faith
27 stipulate to allow additional time to respond to these motions. This is the first
28

1 request for an extension of this deadline.

2 The Parties therefore stipulate that:

- 3 (1) Plaintiff's response to Defendant's motion for an order withdrawing
4 admissions under FRCP 36(b), ECF No. 20, shall be due on **July 11,**
5 **2019**; and
- 6 (2) Defendant's response to Plaintiff's motion for summary judgment, ECF
7 No. 18, shall be due **July 17, 2019**.

8 DATED this 27th day of June 2019.

9 **KAZEROUNI LAW GROUP, APC**

10 By: /s/ Michael Kind

11 Michael Kind, Esq.
12 6069 South Fort Apache Road, Suite 100
13 Las Vegas, Nevada 89148
14 *Attorneys for Plaintiff*

15 **CARLSON & MESSER LLP**

16 By: /s/ J. Grace Felipe

17 J. Grace Felipe, Esq.
18 5901 W. Century Boulevard, Suite 1200
19 Los Angeles, California 90045
20 *Attorneys for Defendant*
21 *Allied Collection Services, Inc.*

22 IT IS SO ORDERED:

23 

24 UNITED STATES DISTRICT JUDGE

25 June 28, 2019

26 DATED: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on June 27, 2019, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind

Michael Kind

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